PHILLIP A. TALBERT **FILED** United States Attorney DAVID W. SPENCER Assistant United States Attorney Mar 03, 2022 501 I Street, Suite 10-100 Sacramento, CA 95814 CLERK, U.S. DISTRICT COURT Telephone: (916) 554-2700 EASTERN DISTRICT OF CALIFORNIA Facsimile: (916) 554-2900 5 6 Attorneys for Plaintiff United States of America 7 IN THE UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 CASE NO. 2:21-CR-0007-JAM UNITED STATES OF AMERICA, 11 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Plaintiff. 12 Distribute and to Possess with Intent to Distribute Fentanyl, Cocaine, and Methamphetamine; 21 U.S.C. 13 V. § 841(a)(1) – Distribution of Fentanyl (6 counts); 21 U.S.C. § 841(a)(1) - Possession with Intent to JOSE GUADALUPE LOPEZ-ZAMORA, 14 Distribute Methamphetamine (2 counts); 21 U.S.C. also known as "Roro," § 841(a)(1) – Possession with Intent to Distribute LEONARDO FLORES BELTRAN, 15 Fentanyl (3 counts); 21 U.S.C. § 841(a)(1) -Possession with Intent to Distribute Heroin; 18 U.S.C. 16 §§ 1956(a)(2), (h) - Conspiracy to Launder Money; CHRISTIAN ANTHONY ROMERO, 21 U.S.C. § 853(a) and 18 U.S.C. § 982 (a)(1) -JASON LAMAR LEE, 17 Criminal Forfeiture BAUDELIO VIZCARRA, JR., 18 also known as "Lucky" and "Junior," 19 JOAQUIN ALBERTO SOTELO VALDEZ, also known as "Junior," RUDI JEAN CARLOS FLORES, 20 SANDRO ESCOBEDO, ERIKA GABRIELA ZAMORA ROJO, 21 JAVIER HERNANDEZ, and JOSE LUIS AGUILAR SAUCEDO, also known as "Chito," ROSARIO ZAMORA ROJO, 23 also known as "Chayo," "Chayito," "Chito," 24 and "Uncle," Defendants. 25 26

SUPERSEDING INDICTMENT

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INDICTMENT

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COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to 1 Distribute Fentanyl, Cocaine, and Methamphetamine 1 2 The Grand Jury charges: T H A T 3 JOSE GUADALUPE LOPEZ-ZAMORA, ROSARIO ZAMORA ROJO, 4 LEONARDO FLORES BELTRAN, 5 CHRISTIAN ANTHONY ROMERO. JASON LAMAR LEE, 6 BAUDELIO VIZCARRA, JR., 7 JOAQUIN ALBERTO SOTELO VALDEZ, RUDI JEAN CARLOS FLORES, 8 SANDRO ESCOBEDO, ERIKA GABRIELA ZAMORA ROJO, and 9 JAVIER HERNANDEZ. defendants herein, beginning on a date unknown to the Grand Jury, but not later than on or about May 10 18, 2019, and continuing through at least September 2, 2021, in Sacramento County, State and Eastern 11 District of California, and elsewhere, did conspire and agree with each other and with persons known 12 and unknown to the Grand Jury to knowingly and intentionally distribute and to possess with intent to 13 distribute: (a) at least 400 grams of a mixture and substance containing a detectable amount of N-14 phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a Schedule II 15 Controlled Substance; (b) a mixture and substance containing a detectable amount of cocaine, a 16 Schedule II Controlled Substance; and (c) at least 50 grams of methamphetamine (actual), a Schedule II 17 Controlled Substance; in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and Title 18 18, United States Code, Section 2. 19 COUNT TWO: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl] 20 21 The Grand Jury further charges: T H A T 22 JOSE GUADALUPE LOPEZ-ZAMORA, and SANDRO ESCOBEDO, 23 defendants herein, on or about September 13, 2019, in Sacramento County, State and Eastern District of 24 California, did knowingly and intentionally distribute a mixture and substance containing a detectable 25 amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a 26 Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), and 27 28 Title 18, United States Code, Section 2.

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COUNT THREE: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl] 1 2 The Grand Jury further charges: T H A T 3 JOSE LUIS AGUILAR SAUCEDO, defendant herein, on or about March 10, 2020, in Sacramento County, State and Eastern District of 4 California, did knowingly and intentionally distribute a mixture and substance containing a detectable 5 amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a 6 Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). 7 COUNT FOUR: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl] 8 9 The Grand Jury further charges: T H A T 10 JOSE LUIS AGUILAR SAUCEDO, defendant herein, on or about April 14, 2020, in Sacramento County, State and Eastern District of 11 California, did knowingly and intentionally distribute at least 40 grams of a mixture and substance 12 containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," 13 a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). 14 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl] 15 The Grand Jury further charges: T H A T 16 17 JOSE LUIS AGUILAR SAUCEDO, defendant herein, on or about August 13, 2020, in Sacramento County, State and Eastern District of 18 California, did knowingly and intentionally distribute a mixture and substance containing a detectable 19 amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a 20 21 Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1). 22 COUNT SIX: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl] The Grand Jury further charges: T H A T 23 JOSE GUADALUPE LOPEZ-ZAMORA, and 24 CHRISTIAN ANTHONY ROMERO, defendants herein, on or about September 4, 2020, in Yolo County, State and Eastern District of 25 California, did knowingly and intentionally distribute at least 40 grams of a mixture and substance 26 containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, 27 28

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1	popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United
2	States Code, Section 841(a)(1).
3	COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl]
4	The Grand Jury further charges: T H A T
5	JOSE GUADALUPE LOPEZ-ZAMORA,
6	defendant herein, on or about October 29, 2020, in Sacramento County, State and Eastern District of
7	California, did knowingly and intentionally distribute at least 40 grams of a mixture and substance
8	containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide,
9	popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United
10	States Code, Section 841(a)(1).
11	COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]
12	The Grand Jury further charges: T H A T
13	JOSE GUADALUPE LOPEZ-ZAMORA,
14	ROSARIO ZAMORA ROJO, JASON LAMAR LEE, and
15	ERIKA GABRIELA ZAMORA ROJO,
16	defendants herein, on or about November 18, 2020, in Sacramento County, State and Eastern District of
17	California, did knowingly and intentionally possess with intent to distribute at least 50 grams of
18	methamphetamine (actual), a Schedule II Controlled Substance, in violation of Title 21, United States
19	Code, Section 841(a)(1).
20	COUNT NINE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]
21	The Grand Jury further charges: T H A T
22	JOSE GUADALUPE LOPEZ-ZAMORA,
23	LEONARDO FLORES BELTRAN,
24	JASON LAMAR LEE, BAUDELIO VIZCARRA, JR., and
25	ERIKA GABRIELA ZAMORA ROJO,
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defendants herein, on or about November 26, 2020, in Sacramento County, State and Eastern District of California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

The Grand Jury further charges: T H A T

JOSE GUADALUPE LOPEZ-ZAMORA, LEONARDO FLORES BELTRAN,

#### JASON LAMAR LEE,

JOAQUIN ALBERTO SOTELO VALDEZ, RUDI JEAN CARLOS FLORES, and ERIKA GABRIELA ZAMORA ROJO,

defendants herein, on or about December 5, 2020, in Sacramento County, State and Eastern District of California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT ELEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl]

The Grand Jury further charges: T H A T

# ROSARIO ZAMORA ROJO,

defendant herein, beginning on a date unknown to the Grand Jury, but not later than on or about January 13, 2021, and continuing through at least September 2, 2021, in Sacramento County, State and Eastern District of California, did knowingly and intentionally possess with intent to distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as "fentanyl," a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

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<u>COUNT TWELVE</u>: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine] 1 2 The Grand Jury further charges: T H A T 3 ROSARIO ZAMORA ROJO, defendant herein, beginning on a date unknown to the Grand Jury, but not later than on or about January 4 13, 2021, and continuing through at least September 2, 2021, in Sacramento County, State and Eastern 5 District of California, did knowingly and intentionally possess with intent to distribute at least 50 grams 6 7 of methamphetamine (actual), a Schedule II Controlled Substance, in violation of Title 21, United States 8 Code, Section 841(a)(1), and Title 18, United States Code, Section 2. 9 <u>COUNT THIRTEEN</u>: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin] 10 The Grand Jury further charges: T H A T 11 ROSARIO ZAMORA ROJO, 12 defendant herein, beginning on a date unknown to the Grand Jury, but not later than on or about January 13, 2021, and continuing through at least September 2, 2021, in Sacramento County, State and Eastern 13 14 District of California, did knowingly and intentionally possess with intent to distribute at least 100 15 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States 16 Code, Section 2. 17 COUNT FOURTEEN: [18 U.S.C. § 1956(a)(2) and (h) – Conspiracy to Launder Money] 18 19 The Grand Jury further charges: T H A T 20 JOSE GUADALUPE LOPEZ-ZAMORA, 21 ERIKA GABRIELA ZAMORA ROJO, 22 23 defendants herein, beginning on a date unknown, but not later than on or about May 18, 2019, and

defendants herein, beginning on a date unknown, but not later than on or about May 18, 2019, and continuing through on or about January 13, 2021, in Sacramento County, State and Eastern District of California, and elsewhere, did combine, conspire, and agree with each other and with persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, specifically: to knowingly transport, transmit, and transfer and attempt to transport, transmit, and transfer, monetary instruments and funds, from a place in the United

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1	States to and through a place outside the United States, to wit: Mexico, (a) with the intent to promote the
2	carrying on of specified unlawful activity, that is, narcotics trafficking, in violation of Title 21, United
3	States Code, Sections 841(a)(1) and 846, and (b) knowing that the funds represented the proceeds of
4	some form of unlawful activity and knowing that the transportation, transmission and transfer, and
5	attempted transportation, transmission and transfer, were designed in whole and in part to conceal and
6	disguise the nature, the location, the source, the ownership and the control of the proceeds of the
7	specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(2) and (h).
8	FORFEITURE ALLEGATION: [21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1) – Criminal Forfeiture]
9	1. Upon conviction of one or more of the offenses alleged in Counts One through Thirteen
10	of this Superseding Indictment, defendants JOSE GUADALUPE LOPEZ-ZAMORA, ROSARIO
11	ZAMORA ROJO, LEONARDO FLORES BELTRAN, CHRISTIAN
12	ANTHONY ROMERO, JASON LAMAR LEE, BAUDELIO
13	VIZCARRA, JR., JOAQUIN ALBERTO SOTELO VALDEZ, RUDI JEAN CARLOS FLORES,
14	SANDRO ESCOBEDO, ERIKA GABRIELA ZAMORA ROJO, JAVIER HERNANDEZ, and JOSE
15	LUIS AGUILAR SAUCEDO, shall forfeit to the United States pursuant to Title 21, United States Code,
16	Section 853(a), the following property:
17	a. All right, title, and interest in any and all property involved in violations of Title
18	21, United States Code, Sections 841(a)(1), or conspiracy to commit such offenses, for which defendants
19	are convicted, and all property traceable to such property, including the following: all real or personal
20	property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a result of
21	such offenses; and all property used, or intended to be used, in any manner or part to commit or to
22	facilitate the commission of the offenses.
23	b. A sum of money equal to the total amount of proceeds obtained as a result of the
24	offenses, or conspiracy to commit such offenses, for which defendants are convicted.
25	2. Upon conviction of the offense alleged in Count Fourteen of this Superseding Indictment,
26	defendants JOSE GUADALUPE LOPEZ-ZAMORA,

and ERIKA GABRIELA ZAMORA ROJO, shall forfeit to the United

States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in such offense, and

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1	any property traceable to such property, including but not limited to the following:				
2	a. A sum of money equal to the total amount of money involved in the offense, for				
3	which defendants are convicted.				
4	3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One				
5	through Fourteen of this Superseding Indictment, for which defendants are convicted:				
6	a. cannot be located upon the exercise of due diligence;				
7	b. has been transferred or sold to, or deposited with, a third party;				
8	c. has been placed beyond the jurisdiction of the Court;				
9	d. has been substantially diminished in value; or				
10	e. has been commingled with other property which cannot be divided without				
11	difficulty;				
12	it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 18,				
13	United States Code, Section 982(b)(1), to seek forfeiture of any other property of defendants, up to the				
14	value of the property subject to forfeiture.				
15					
16	A TRUE BILL.				
17	/s/ Signature on File with USA				
18	FOREPERSON				
19	FOREI ERSON				
20	/s/ Phillip A. Talbert				
21	PHILLIP A. TALBERT				
22	United States Attorney				
23					
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25					
26					
27					
28					

No.2:21-CR-0007 MCE

#### UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA vs.

JOSE GUADALUPE LOPEZ-ZAMORA, also known as "Roro,"

LEONARDO FLORES BELTRAN,

CHRISTIAN ANTHONY ROMERO, JASON LAMAR LEE,

BAUDELIO VIZCARRA, JR.,
also known as "Lucky" and "Junior,"
JOAQUIN ALBERTO SOTELO VALDEZ,
also known as "Junior,"
RUDI JEAN CARLOS FLORES,
SANDRO ESCOBEDO,
ERIKA GABRIELA ZAMORA ROJO,
JAVIER HERNANDEZ, and
JOSE LUIS AGUILAR SAUCEDO,
also known as "Chito,"
ROSARIO ZAMORA ROJO,
also known as "Chayo," "Chito," and "Uncle,"

# SUPERSEDING INDICTMENT

#### **VIOLATION(S):**

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to Distribute Fentanyl, Cocaine, and Methamphetamine,

21 U.S.C. § 841(a)(1) – Distribution of Fentanyl (6 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine (2 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Fentanyl (3 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin;
18 U.S.C. § 81956(a)(2)(A), (h) – Conspiracy to Launder Money;
21 U.S.C. § 853(a) and 18 U.S.C. § 982 (a)(1) – Criminal Forfeiture

A true bill,	/s/ Signature on file w/AUSA
	·
	Foreman.
Filed in open court this _	3rd day
ofMarch	, A.D. 20 <u>22</u>

	/s/ N. Cannarozzi	
Bail, \$ _ No bail b	ench warrant to issue for Sandro Escobedo	
	GPO 863 525	
	JEREMY D. PETERSON UNITED STATES MAGISTRATE JUDGE	-

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# <u>United States v. LOPEZ-ZAMORA, et al.</u> Penalties for Superseding Indictment

**Defendants** 

Jose Guadalupe LOPEZ-ZAMORA Rosario ZAMORA ROJO Leonardo FLORES BELTRAN

Christian Anthony ROMERO

Jason Lamar LEE

Baudelio VIZCARRA, JR.
Joaquin Alberto SOTELO VALDEZ
Rudi Jean Carlos FLORES
Sandro ESCOBEDO
Erika Gabriela ZAMORA ROJO
Javier HERNANDEZ
Jose Luis AGUILAR SAUCEDO

COUNT 1: Defendants LOPEZ-ZAMORA, Rosario ZAMORA-ROJO, FLORES

BELTRAN, ROMERO, LEE,

VIZCARRA JR., SOTELO VALDEZ, FLORES, ESCOBEDO, Erika

ZAMORA ROJO, and HERNANDEZ

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with

Intent to Distribute: (a) at least 400 grams of a mixture and substance

containing Fentanyl; (b) cocaine; and (c) at least 50 grams of

methamphetamine (actual)

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in

prison; or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 2:** Defendants LOPEZ-ZAMORA and ESCOBEDO

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Fentanyl

PENALTIES: A maximum of up to 20 years in prison; or

Fine of up to \$1,000,000; or both fine and imprisonment

Supervised release of at least 3 years up to life

COUNT 3: Defendant AGUILAR SAUCEDO

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Fentanyl

PENALTIES: A maximum of up to 20 years in prison; or

Fine of up to \$1,000,000; or both fine and imprisonment

Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 4: Defendant AGUILAR SAUCEDO

VIOLATION: 21 U.S.C. § 841(a)(1) - Distribution of at least 40 grams of a mixture and

substance containing Fentanyl

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40

years in prison; or

Fine of up to \$5,000,000; or both fine and imprisonment

Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 5: Defendant AGUILAR SAUCEDO

VIOLATION: 21 U.S.C. § 841(a)(1) - Distribution of Fentanyl

PENALTIES: A maximum of up to 20 years in prison; or

Fine of up to \$1,000,000; or both fine and imprisonment

Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 6:** Defendants LOPEZ-ZAMORA and ROMERO

VIOLATION: 21 U.S.C. § 841(a)(1) - Distribution of at least 40 grams of a mixture and

substance containing Fentanyl

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40

years in prison; or

Fine of up to \$5,000,000; or both fine and imprisonment

Supervised release of at least 4 years up to life

**COUNT 7:** Defendant LOPEZ-ZAMORA

VIOLATION: 21 U.S.C. § 841(a)(1) - Distribution of at least 40 grams of a mixture and

substance containing Fentanyl

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40

years in prison; or

Fine of up to \$5,000,000; or both fine and imprisonment

Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 8: Defendants LOPEZ-ZAMORA, Rosario ZAMORA ROJO, LEE, and

Erika ZAMORA ROJO

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute at least 50

grams of Methamphetamine (actual)

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in

prison; or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 9: Defendants LOPEZ-ZAMORA, FLORES BELTRAN,

LEE, VIZCARRA JR., and Erika ZAMORA ROJO

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute at least 400

grams of a mixture and substance containing Fentanyl

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in

prison; or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years up to life

COUNT 10: Defendants LOPEZ-ZAMORA, FLORES BELTRAN,

LEE, SOTELO VALDEZ, FLORES, and

Erika ZAMORA ROJO

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute at least 400

grams of a mixture and substance containing Fentanyl

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in

prison; or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 11: Defendant Rosario ZAMORA ROJO

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute at least 400

grams of a mixture and substance containing Fentanyl

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in

prison; or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 12:** Defendant Rosario ZAMORA ROJO

VIOLATION: 21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute at least 50

grams of Methamphetamine (actual)

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in

prison; or

Fine of up to \$10,000,000; or both fine and imprisonment

Supervised release of at least 5 years up to life

**COUNT 13:** 

Defendant Rosario ZAMORA ROJO

**VIOLATION:** 

21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute at least 100

grams of a mixture and substance containing heroin

PENALTIES:

Mandatory minimum of 5 years in prison and a maximum of up to 40

years in prison; or

Fine of up to \$5,000,000; or both fine and imprisonment

Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 14:** 

Defendants LOPEZ-ZAMORA,

and Erika ZAMORA ROJO

VIOLATION:

18 U.S.C. § 1956(a)(2)(h) – Conspiracy to Launder Money

PENALTIES:

Up to 20 years in prison;

Fine of up to \$500,000 or twice the value of the monetary instrument or

funds involved, whichever is greater; Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

# FORFEITURE ALLEGATION: All Defendants

VIOLATION:

21 U.S.C. § 853(a) and 18 U.S.C. § 982(a)(1) - Criminal Forfeiture

PENALTIES:

As stated in the charging document